



217/782-6761

Refer to: # 1950450006 -- Whiteside County  
Roxite Fiberglass-Haas & Haas  
ILD 061047502  
RCRA - Permits

EPA Region 5 Records Ctr.



334756

May 6, 1988

Roxite Fiberglass-Haas & Haas  
803 E. 11th Street  
Rock Falls, Illinois 61071

Attn: Environmental Coordinator or  
Plant Manager

Dear Sir:

According to Agency files, your facility currently manages hazardous waste in containers and/or tanks subject to the requirements of 35 IAC 700-725. 35 IAC 703.157(f) states that interim status for any hazardous waste storage or treatment facility will be terminated November 8, 1992, unless the facility submits Part B of the RCRA permit application for these units to this Agency by November 8, 1988. This letter is written to (1) make you aware of this requirement and (2) describe the actions which must be taken in response to this requirement.

According to 35 IAC 703.157(f), if an existing facility desires to (1) store hazardous waste on-site for greater than ninety (90) days, (2) treat hazardous waste, or (3) store hazardous waste as a commercial facility after November 8, 1992, it must submit Part B of the RCRA permit application to this Agency by November 8, 1988. The information which must be contained in this application is described in 35 IAC 703, Subpart D. The enclosed document, entitled "RCRA Permit Guidance" provides more detail regarding the necessary contents of the application and also identifies several guidance documents which will be useful in developing the application. Also included in this document is the form which must be used when submitting the application.

If a facility does not desire to continue storing and/or treating hazardous waste after November 8, 1992, it must close the storage and/or treatment unit(s) present at the facility prior to this date. Closure, in this instance, basically means that all contamination must be removed from the unit(s) and if necessary, from the area surrounding these units. The requirements which must be met in closing these units are contained in 35 IAC 725, Subpart C. For your convenience, guidance for the development of a closure plan is contained in the enclosed document entitled "Instructions for the Preparation of Closure Plans for Interim Status RCRA Hazardous Waste Facilities." PLEASE NOTE THAT A CLOSURE PLAN DOES NOT NEED TO BE SUBMITTED AT THIS TIME. IT MUST HOWEVER, BE SUBMITTED TO THE AGENCY NO LATER THAN MAY 8, 1992.



Page 2

In some instances, there may be several interim status hazardous waste management units at a facility. The facility may desire to pursue a final RCRA permit for a portion of these units and close the rest of them. Because of the uncertainty associated with this option, all interim status units at a facility must be included in Part B of the RCRA permit application, unless a closure plan for the units being closed is submitted with the Part B. If a closure plan is submitted with the Part B, the application need only address those units which will remain in operation.

The only alternatives available for hazardous waste treatment and storage facilities to meet the requirements of 35 IAC 703.157(f) are (1) submit Part B of the RCRA permit application by November 8, 1988 or (2) close by November 8, 1992. However, some facilities may have previously filed Part A of the RCRA permit application in error and now feel that the hazardous waste management activities carried out at the facility do not require a RCRA permit (i.e. the Part A was filed for protective measures). If this is the case, the Agency requests that information supporting this position be submitted no later than November 8, 1988. The Agency can then review the information submitted and correct its records accordingly. The information which must be submitted to make this demonstration is contained in the enclosed document entitled "Facility Part A Withdrawal Request Form."

Finally, some facilities may have closed or are currently closing in accordance with an IEPA approved closure plan. (Please bear in mind this letter is going out to over 200 facilities; some closed facilities may inadvertently receive this letter.) In this instance, the Agency requests that a copy of (1) the closure plan approval letter and (2) the letter from the Agency accepting the certifications of the owner/operator and the registered professional engineer that closure was carried out in accordance with the approved closure plan (if closure has been completed) be submitted by November 8, 1988. The Agency will again be able to review this information and correct its records accordingly.

Because of the large number of facilities subject to the requirements of 35 IAC 703.157(f), the Agency requests that all facilities receiving this letter complete the enclosed form entitled "RCRA Permit Information Form." The form has been developed such that it can be used by a facility falling into any of the five categories described above (pursuing a final permit, planning to close, pursuing a permit for only a portion of the interim status units and closing the other units, protective filers, closed in accordance with an IEPA approved closure plan). This form must be submitted to the Agency no later than November 8, 1988, along with all required attachments. Failure to do so may subject a facility to enforcement under State and/or Federal regulations and possible monetary penalties up to \$25,000 per day of noncompliance.



Page 3

The RCRA Permit Information Form and all required attachments must be submitted in triplicate (original and two (2) copies) to the following address:

Permit Section, RCRA Unit  
Division of Land Pollution Control  
Illinois Environmental Protection Agency  
2200 Churchill Road  
P.O. Box 19276  
Springfield, IL 62794-9276

If you have any questions regarding this letter, please contact Jim Moore at 217/782-9875.

Very truly yours,

A handwritten signature in cursive script that reads "Lawrence W. Eastep".

Lawrence W. Eastep, P.E., Manager  
Permit Section  
Division of Land Pollution Control

LWE:JKM:dks/1238j/1244j/1-3

Enclosures

cc: Division File  
Compliance  
Rockford Region  
USPEA Region V



ATTACHMENT

This statement is to be completed by both the responsible officer and by the registered professional engineer upon completion of closure. Submit one copy of the certification with original signatures and three additional copies.

Closure Certification Statement

The hazardous waste management unit (S01) at the facility described in this document has been closed in accordance with the specifications in the approved closure plan. I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

ILD061047502  
USEPA ID Number

ROXITE FIBERGLASS  
Facility Name

*John J. Davis*  
Signature of Owner/Operator

PRESIDENT  
Name and Title

*Richard A. Baumann*  
Signature of Registered P.E.

Richard A. Baumann 062-35417  
Name of Registered P.E. and  
Registration Number

*October 8, 1987*  
Date

WKE:pmd3164g/63

RECEIVED

OCT 9 1987

IEPA/DLPC

**ANALYTICAL REPORT**

Mr. Dennis Milby  
ROXITE FIBERGLASS  
P.O. Box 830  
Rock Falls IL 61071

09-18-87

**SAMPLE DESCRIPTION: Water Samples**

Date Received: 09-14-87 1300

48921 Wash Water

09-11-87 1200

Methylene chloride  
Acetone

<250.  
<250.

ug/L  
ug/L

48922 Rinse Water

09-11-87 1230

Methylene chloride  
Acetone

23.  
<10.

ug/L  
ug/L

High detection limits due to foaming of sample

  
Toni Gartner, Manager  
Rockford Division**NET**

A NATIONAL ENVIRONMENTAL TESTING, INC., COMPANY



Illinois Environmental Protection Agency

2200 Churchill Road, Springfield, IL 62706

217/782-6762

Refer to: 1950450006 -- Whiteside County  
Rock Falls/Roxite Fiberglass  
Closure Plan Approved: August 11, 1987 Log # C-328  
ILD061047502  
RCRA-Closure

January 5, 1988

Dennis Milby  
Roxite Fiberglass  
P.O. Box 830  
Rock Falls, Illinois 61071-0830

Dear Mr. Milby:

The subject hazardous waste management facility was inspected by a representative of this Agency on October 30, 1987. The inspection revealed that the closure activity was completed in accordance with the approved final closure plan dated August 11, 1987.

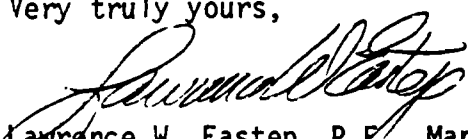
Certification that the hazardous waste container storage area (S01) had been closed in accordance with the approved closure plan by the operator, Dennis Milby, and an independent registered professional engineer, Richard A. Baumann, P.E., of Illinois was received at this Agency October 9, 1987.

The Agency has determined that the final closure of the Roxite Fiberglass has apparently met the requirements of Interim Status Standards, 35 Ill. Admin. Code, Part 725 (40 CFR, Part 265).

This facility must continue to meet the applicable requirements of 35 IAC Part 722 - Standards Applicable to Generators of Hazardous Waste and Part 723 - Standards Applicable to Transporters of Hazardous Waste.

If you have any questions, please contact Wally K. El-Beck at 217/782-2445.

Very truly yours,

  
Lawrence W. Eastep, P.E., Manager  
Permit Section  
Division of Land Pollution Control

LWE:WKE:rmi/4712g/14

cc: Rockford Region  
USEPA Region V, Mary Murphy  
USEPA Region V, Art Kawatachi  
Richard A. Baumann, P.E.  
Division File  
Financial Assurance Unit  
Compliance Monitoring

Closure 328

Rockford  
WKE

DATE: 10-20-87

plan app-18-12-87

TO: Permit Section

FROM:

SUBJECT: CLOSURE VERIFICATION INSPECTION FOR:

FACILITY:

Roxite Fiberglass

FEDERAL ID:

061047502

STATE ID:

1950450006

COUNTY:

St. Louis

DATE OF INSPECTION:

10/30/87

Regulated Unit Codes Closed

501

Regulated Unit Codes Still Open

501

Current Regulated Status (i.e., G, T, TSD)

GEN. & TSD

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NOV 19 1987

IEPA/DLPC

Was the facility closed in accordance with approved closure plan?

Yes X

No

(If No, Explain in Comments)

**COMMENTS:** A closure inspection was conducted at the Roxite Fiberglass

Co. located at Rock Falls on October 30, 1987 by Jack Holzer of this

Agency. The purpose of the inspection was to verify that the closure

plan had been completed in accordance with the regulations and requirements

of the facility's closure plan. All existing drums of hazardous waste

on site were labeled with the starting date of accumulation. No containers

have been, or will be maintained on site for longer than 90 days.

All soil samples taken and test results from the soil samples collected

by Roxite were witnessed by Richard Bauman, P.E., of Harold P. Wendler,

& Assoc. (Registered Professional Engineers). Upon the completion

of the closure, a closure certification statement was submitted certifying

that the drum storage area (S01) and surrounding area was properly

closed in accordance with the approved closure plan. No new violations

were found during the inspection.

# ROXITE

Molders of Engineered Materials

October 7, 1987

RECEIVED  
OCT 9 1987  
IEPA/DLPC

Mr. Walley El-Beck  
Illinois Enviromental Protection Agency  
2200 Churchill Road  
Springfield, IL 62706

Dear Mr. El-Beck:

This letter is in reponse to the stipulations set forth in your correspondence of August 11, 1987 concerning the proposed closure of the hazardous waste storage area located at the Roxite Fiberglass facility in Rock Falls, Illinois.

Item #1

All soil samples taken adjacent to the storage area clean up activity were taken, in accordance with the latest edition of U.S.E.P.A Document SW-846, from the drainage area at depths of six (6) inches and from 18 inches to 24 inches respectively per your request of June 8, 1987.

The test results from the soil samples collected by Roxite and witnessed by Richard Bauman, P.E. of Harold P. Wendler and Associates (REGISTERED PROFESSIONAL AND STRUCTURAL ENGINEERS) are enclosed.

Methylene Choloride < 5.0 ng/g = Less than .005 Parts per Million

Acetone <25.0 ng/g = Less than .025 Parts per Million

The Aqualab Inc. test results stated in terms of (ng/g), indicates the lowest level of detection achievable with their U.S.E.P.A. approved analysing equipment, with the symbol (<) indicating that the actual levels are lower than the analytical testing equipments detecting cababilities.

Item #2

Two 55 gallon drums of liquid were produced during the cleaning phase of the storage area closure activity. First drum being wash water and the second drum being rinse water.

**ROXITE Fiberglass**  
803 East 11th Street  
P.O. Box 830  
Rock Falls, Illinois 61071-0830  
Telephone: 815-625-8112



All sampling and analytical tests performed on both wash and rinse water were in accordance with the latest edition of U.S.E.P.A. Document SW-846. Richard Bauman, P.E., from Harold P. Wendler and Associates witnessed the washing, rinsing, and sampling to assure compliance to SW-846.

The following test results of wash water solution and rinse water by the independent laboratory, enclosed.

Wash water:

Methylene Chloride <250. ug/L = Less than .250 Parts per Million

Acetone <250. ug/L = Less than .250 Parts per Million

Rinse Water:

Methylene Chloride < 23. ug/L = Less than .023 Parts per Million

Acetone < 10. ug/L = Less than .010 Parts per Million

Based on the above wash water test results, although marginally below the minimum acceptable levels, the wash water will be disposed as, Hazardous Waste and will be labeled and handled in accordance with I.E.P.A. rules & regulations, as set forth for hazardous waste disposal, by the I.E.P.A.

Based on the rinse water test results, substantially below the minimum acceptable levels, the rinse water will be disposed in a conventional fashion posing no threat to environmental stability.

Item #4

Closure Documentation Report

A. One 55 gallon drum of wash water and one 55 gallon drum of rinse water were generated during the waste area clean-up activity.

Subsequent analytical analysis showed only the wash water to be of an unexceptable level of contaminates and was therefore permitted and disposed of through a hazardous waste treatment facility.

B. Contaminated wash water was placed in a closed top D.O.T. approved 55 gallon drum and all appropriate labeling affixed there on.

C. Waste manifest number:

D. Copies of manifest enclosed. Manifest number and copies of

manifest to be forwarded to I.E.P.A. upon completion of shipment for disposal per regulatory guidelines.

E. Samples of both wash and rinse water were drawn from the 55 gallon drums used to collect and store the cleaning liquids. Glass containers with teflon lined caps were supplied by Aqualab for samples retention.

Care was taken to insure vessel was completely full leaving no room for air, and after sealing, samples were inverted to assure that no air bubbles were present within the sealed container.

Chain of custody forms were filled out, samples were carefully packaged and shipped to Aqualab Inc. in Rockford, Illinois for analysis all in accordance with the requirements set forth in the latest edition of U.S.E.P.A. Document SW-846.

Richard Bauman, P.E. was present at Roxite Fiberglass to assure our compliance and verify our actions as they pertain to SW-846.

F. Chronological Summary

<u>5-26-87</u>	Submission of initial hazardous waste storage area closure plan to I.E.P.A.
<u>6-08-87</u>	Instructed by Wally El-Beck of the I.E.P.A. that soil samples should be taken from the drain area of the hazardous waste storage area.
<u>6-10-87</u>	Samples taken from first 6 inches of soil and from 18 to 24 inches respectively. Soil samples and a chain of custody form sent to Aqualab for analytical testing of Acetone and Methylene Chloride levels.
<u>6-12-87</u>	Report on soil samples and chain of custody for received back from Aqualab.
<u>8-05-87</u>	Closure plan revision letter sent to Wally El-Beck I.E.P.A.
<u>8-11-87</u>	Roxite storage area closure plan reviewed and approved by I.E.P.A. in letter dated 8-11-87.
<u>9-11-87</u>	Hazardous waste storage area scrubbed down with hot soapy water and rinsed per I.E.P.A. guidelines. (Photos enclosed)
<u>9-19-87</u>	Analytical report on wash and rinse water along with the chain of custody form received from Aqualab.

\_\_\_\_\_ Contaminated wash water shipped out for proper disposal. Awaiting acceptance from approved waste disposal firm.

G. Photo Documentation

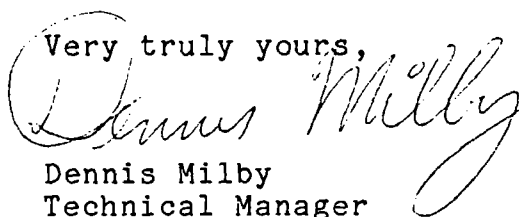
- #1. Hazardous waste storage area being scrubbed during wash phase.
- #2. Richard Bauman, P.E., from Harold P. Wendler and Associates observing all facets of the closure activities.
- #3. Rinse water being collected and placed into 55 gallon drum for proper storage.
- #4. Storage area after all scrubbing, rinsing, water collection, and sample retentions have been completed.

H. Tests performed by Aqualab Inc. were for volatile organic compounds per method number 8240 reference U.S.E.P.A. document SW-846. (Results attached)

Roxite Fiberglass feels this reponse should answer all questions and satisfy all requirements set forth in your August 11, 1987 letter to us regarding our proposed hazardous waste storage area closure.

If any further information is needed we are more than willing and anxious to cooperate in order to conclude these closure activities and proceed with our plant expansion.

Very truly yours,

  
Dennis Milby  
Technical Manager